

**From:** Ondeck, Katherine C.  
**To:** "J. Andrew Baxter"  
**Cc:** Maiolo, Tina M.; Blunt, Christina M.; Williams, Teresa T.  
**Subject:** RE: Kariuki v. eTeam - Depositions/Discovery  
**Date:** Monday, January 04, 2016 3:47:12 PM

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Andy,

I am following up on our request for available dates for Plaintiff's deposition. Because the discovery deadline is 1/15/2016, please let us know what dates in the next week your client is available for her deposition. If we do not hear from you by tomorrow, we will go ahead and notice her deposition for some time in the next week or so.

Also, we have not yet received the written reports of seven of Plaintiff's eight designated experts, as only Mr. Miggliazzi's report accompanied Plaintiff's expert witness disclosure. Please provide us with these reports.

Additionally, we have not received complete responses to our discovery requests—specifically, we have not yet received the following: all medical records/bills relating to any alleged injuries or conditions Plaintiff suffered as a result of the events alleged in the Complaint; all personnel and employment records related to Plaintiff's employment for the previous ten years; and all documents reflecting efforts Plaintiff has made to gain employment since August 5, 2013. Please provide us with these documents.

If we do not receive the above-referenced expert reports and requested documentation by this Wednesday 1/6, we will file a motion to compel and for sanctions.

Thank you,  
Katherine

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**From:** Ondeck, Katherine C.  
**Sent:** Thursday, December 31, 2015 11:59 AM  
**To:** J. Andrew Baxter  
**Cc:** Maiolo, Tina M.; Blunt, Christina M.; Williams, Teresa T.  
**Subject:** Kariuki v. eTeam - Depositions/Discovery

Hi Andy,

As the 1/15/2016 discovery deadline is approaching, please provide us with available dates in the next two weeks for the Plaintiff's deposition.

Also, only Mr. Miggliazzi's expert report was attached to Plaintiff's expert designation. Please forward us the other expert reports. Additionally, there remains some outstanding discovery requests—please forward us all medical records/bills relating to any alleged injuries or conditions Plaintiff suffered as a result of the events alleged in the Complaint; all personnel and employment records related to Plaintiff's employment for the previous ten years; and all documents reflecting



efforts Plaintiff has made to gain employment since August 5, 2013.

Please feel free to contact me at (202) 310-5503 if you would like to discuss further.

Happy New Year,  
Katherine

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Carr Maloney has moved to 2020 K Street, NW, Suite 850, Washington, DC 20006. Please update your records with our new address.



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